

1 **SOED**

2 **LOREN S. YOUNG, ESQ.**

3 Nevada Bar No. 7567

4 **JULIE A. WHITE, ESQ.**

5 Nevada Bar No. 8725

6 **LINCOLN, GUSTAFSON & CERCOS, LLP**

7 *ATTORNEYS AT LAW*

8 7670 W Lake Mead Blvd, Suite 200

9 Las Vegas, Nevada 89128

10 Telephone: (702) 257-1997/ Facsimile: (702) 257-2203

11 lyoung@lgclawoffice.com

12 jwhite@lgclawoffice.com

13 Attorneys for Defendant, TARGET CORPORATION

14 UNITED STATES DISTRICT COURT

15 DISTRICT OF NEVADA

16 ANA ARAMBULA RAMIREZ, an
17 individual,

18 Plaintiff,

19 v.

20 TARGET CORPORATION, a Foreign
21 Corporation; DOES I through X, inclusive
22 and ROE BUSINESS ENTITIES I through X,
23 inclusive,

24 Defendants.

CASE NO. 2:24-cv-02215-MMD-DJA

25 **STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

26 **(Second Request)**

27 Plaintiff, ANA ARAMBULA RAMIREZ ("Plaintiff"), by and through her attorney of record,
28 DANIEL C. TETREAULT, ESQ. and RAMZY P. LADAH, ESQ. of the law firm LADAH LAW
FIRM and Defendant, TARGET CORPORATION ("Defendant"), by and through its attorneys of
record, LOREN S. YOUNG, ESQ. of the law firm LINCOLN, GUSTAFSON & CERCOS, LLP,
pursuant to Fed. R. Civ. P. 6, Fed. R. Civ. P. 26, LR 26-1 and LR 26-4, and hereby stipulate and
request that the Court extend the discovery deadlines by approximately ninety (90) days continuance
of the current discovery deadlines to give the parties additional time to conduct discovery and discuss
possible resolution.

I. DISCOVERY COMPLETED

1. Plaintiff served Initial Disclosures on February 6, 2025
2. Plaintiff served First Supplemental Disclosures on March 11, 2025
3. Defendant served their Initial Disclosures on February 4, 2025
4. Plaintiff served Requests for Production, Interrogatories to Defendant on March 31, 2025
5. Defendant served Requests for Production and Interrogatories to Plaintiff on March 7, 2025.
6. Plaintiff served Responses to Requests for Production and Interrogatories on April 7, 2025.
7. Plaintiff served their Second Supplemental Disclosure on April 7, 2025.
8. Plaintiff served their Notice of Taking Deposition of the FRCP 30(b)(6) Designee for Target Corporation on May 6, 2025.
9. Defendant served Responses to Requests for Production and Interrogatories on May 14, 2025.
10. Defendant served their First Supplemental Disclosures on May 14, 2025.
11. Plaintiff served their Amended Notice of Taking Deposition of the FRCP 30(b)(6) Designee for Target Corporation on May 20, 2025.
12. Plaintiff served their Notice of Cancellation of Deposition of the FRCP 30(b)(6) Designee for Target Corporation on June 16, 2025.
13. Defendant served their Second Supplemental Disclosures on June 25, 2025.
14. Defendant served their Third Supplemental Disclosures on June 25, 2025.
15. Defendant served their Fourth Supplemental Disclosures on July 14, 2025.
16. Defendant served their Fifth Supplemental Disclosures on July 18, 2025.
17. Plaintiff served their Third Supplemental Disclosures on July 18, 2025.
18. Defendant served their Sixth Supplemental Disclosures on August 7, 2025.
19. Defendant served their Seventh Supplemental Disclosures on August 7, 2025.
20. Plaintiff served their Second Notice of Taking Deposition of the FRCP 30(b)(6) Designee for Target Corporation on August 8, 2025.
21. Defendant served their Eighth Supplemental Disclosure on August 12, 2025.
22. Defendant served their Ninth Supplemental Disclosure on August 13, 2025.
23. Defendant served their Tenth Supplemental Disclosure on August 19, 2025.

II. DISCOVERY THAT REMAINS TO BE COMPLETED

1. Deposition(s) of Plaintiff;
2. Depositions of Plaintiff's witnesses;
3. Deposition(s) of Plaintiff's treating physician(s);
4. Depositions of witnesses identified by Plaintiff and Defendant;
5. Initial and Rebuttal Expert Disclosures;
6. Depositions of retained experts;
7. FRCP 35 Exam; and
8. Other discovery as deemed necessary by the parties.

III. REASON DISCOVERY HAS NOT BEEN COMPLETED

The parties have been diligently engaged in discovery thus far and wish to engage in resolution discussions. The parties wish to avoid unnecessary costs, fees and expenses in the interest of potential resolution, in light of completed treatment and low damages. The parties are seeking a 90-day continuance to allow the parties to obtain the ongoing medical records as Plaintiff is still seeking medical treatment which is delaying the scheduling of a FRCP 35 examination and would like to mediate before expending significant time and funds on experts.

PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY

It is hereby stipulated that the discovery cutoff deadline be extended for a period of 90 days. If approved, the new discovery deadlines would be modified as follows:

///

///

///

///

///

///

///

///

///

EVENT DEADLINE	CURRENT DATE	PROPOSED DATE
Close of Discovery	11/18/2025	02/16/2026
Motions to Amend Pleadings	08/20/2025	11/18/2025
Initial Expert Disclosures	09/19/2025	12/18/2025
Rebuttal Expert Disclosures	10/17/2025	01/15/2026
Dispositive Motions	12/18/2025	03/18/2026
Joint Pre-Trial Order	01/17/2026	04/17/2026

IT IS SO STIPULATED AND AGREED.

DATED this 20th day of August, 2025

DATED this 20th day of August, 2025

LADAH LAW FIRM

LINCOLN, GUSTAFSON & CERCOS

/s/ Daniel C. Tetreault, Esq.

/s/ Loren S. Young, Esq.

DANIEL C. TETREAULT, ESQ.

LOREN S. YOUNG, ESQ.

Nevada Bar No. 11473

Nevada Bar No. 7567

daniel@ladahlaw.com

JULIE A. WHITE, ESQ.

517 S. Third Street

Nevada Bar No. 8725

Las Vegas, NV 89101

7670 W. Lake Mead Blvd, Suite 200

Attorneys for

Las Vegas, Nevada 89128

ANA ARAMBULA RAMIREZ

Attorneys for Defendant,

TARGET CORPORATION

ORDER

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: 8/21/2025